IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES : CRIINAL No.: 15-180-MSG

V. :

LEVERN JACKSON :

<u>DEFENDANT LEVERN JACKSON'S MOTION TO JOIN THE PRETRIAL MOTIONS</u> OF THE OTHER DEFENDANTS

AND NOW, Levern Jackson, defendant, by and through counsel, Kenneth Edelin, Esq., hereby respectfully requests the Court grant, and Order, the following:

- 1. Levern Jackson is a part of a fifteen (15) person indictment, for which he had prior counsel;
- 2. Kenneth Edelin was appointed to represent Mr. Jackson, replacing prior counsel by the Court;
- 3. The discovery is voluminous, and the case has been declared complex by the Court;
- 4. Mr. Jackson is scheduled to be included in the first of the three trial phases of this indictment, which is currently listed to begin January 31, 2017;
- 5. If Mr. Jackson has standing, and if the relief sought applies to him, it is requested of the Court that Mr. Levern Jackson be permitted to join in the pretrial motions of the other defendants.

WHEREFORE, it is respectfully requested that this Court grant the above request, and permit Mr. Levern Jackson to join the pretrial motions filed by the other defendants.

Respectfully,

_/s/_Kenneth Edelin__ Kenneth Edelin, Esq. 1515 Market Street, Suite 1200 Philadelphia, PA 19102 215.592.0499 : 215.592.0522 fax

kce@KceEsqPC.com

Date: September 21, 2016

CoS via ECF: Salvatore Astolfi, AUSA

615 Chestnut Street, Suite 1250

Philadelphia, PA 19106

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UNITED STATES	: CRIINAL No.: 15-180-MSG	
V.	:	
LEVERN JACKSON	:	
	<u>ORDER</u>	
AND NOW, this Levern Jackson's Motion to Join Pr	day of, 2016, in consideration of defenrial Motions, and any response thereto by the government,	ndant
IT IS HEREBY ORDERED that Le defendants, if he has standing.	ern Jackson is permitted to join the pretrial motions of the oth	ier co
	BY THE COURT:	
	HONORABLE MITCHELL S. GOLDBERG, District Jud	_ lge